

4. As indicated in the Certificate of Conference below, Plaintiffs do not oppose the relief requested by this motion.

5. This extension is sought for good cause. Counsel for Defendant STA is still in the process of attempting to resolve the issues presented by Plaintiffs' motion to compel and believes that additional time will likely facilitate resolution of the issues presented by Plaintiffs' motion without the necessity of court intervention. Since the last requested extension, the parties have made significant progress identifying the specific information sought by Plaintiffs; and STA believes that the parties will reach resolution within the additional time requested.

6. Accordingly, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), STA respectfully requests that this Court extend the deadline for STA to file its response to Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition until May 21, 2014.

Date: May 14, 2014

Respectfully submitted,

/s/ John Volney

Jeffrey M. Tillotson, P.C. (jtillotson@lynnllp.com)

Texas State Bar No. 20039200

Alan Dabdoub (adabdoub@lynnllp.com)

Texas State Bar No. 24056836

John Volney (jvolney@lynnllp.com)

Texas State Bar No. 24003118

LYNN TILLOTSON PINKER & COX, L.L.P.

2100 Ross Avenue, Suite 2700

Dallas, Texas 75201

(214) 981-3800 Telephone

(214) 981-3839 Facsimile

**ATTORNEYS FOR DEFENDANT
SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC**

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Plaintiffs' counsel regarding the matters at issue in this motion. During that conference, counsel indicated that Plaintiffs are not opposed to the relief sought herein.

Certified to on May 14, 2014, by

/s/Alan Dabdoub

Alan Dabdoub

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on May 14, 2014.

/s/ John Volney

John Volney